

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of Adi Haft and Simon Tal
Doyev for an Order Pursuant to 28 U.S.C. §
1782 to Conduct Discovery for Use in Foreign
Proceedings

Case No. 17-mc- ____

***EX PARTE APPLICATION OF ADI HAFT AND SIMON TAL DOYEV FOR AN ORDER
PURSUANT TO 28 U.S.C. § 1782 TO CONDUCT DISCOVERY FOR USE
IN FOREIGN PROCEEDINGS***

Based upon the Memorandum of Law, the declaration of Adi Haft and the exhibits appended thereto, Adi Haft and Simon Tal Doyev (the “Applicants”) hereby apply to this Court for an Order, pursuant to 28 U.S.C. § 1782 and Rules 26, 30, 34, and 45 of the Federal Rules of Civil Procedure, granting the Applicants leave to take discovery from Bruce Philip Rockowitz, Ronald Ventricelli, and Dow Famulak, and to serve the subpoenas attached as Exhibits A-C to the Proposed Order submitted concurrently herewith.

Dated: New York, New York
December 15, 2017

Respectfully submitted,

/s/ Jacob S. Pultman

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